

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ROBERT MENENDEZ, et al.

Defendants.

Case No. 23-cr-00490 (SHS)

**MEDIA COALITION'S MOTION TO INTERVENE AND UNSEAL
DEFENDANT SENATOR ROBERT MENENDEZ'S SEVERANCE MOTION**

NBCUniversal Media LLC d/b/a NBCUniversal News Group; Cable News Network, Inc.; American Broadcasting Companies, Inc. d/b/a ABC News; Gannett Satellite Information Network, LLC d/b/a Bergen Record; Politico, LLC; Fox News Network, LLC; New Jersey Globe; WP Company LLC d/b/a The Washington Post; CBS Broadcasting Inc. d/b/a CBS News; The E.W. Scripps Company o/b/o CourtTV and Scripps News; and NYP Holdings, Inc. d/b/a New York Post; The Associated Press; Bloomberg L.P. (together, the "Media Coalition"), by and through undersigned counsel, hereby move pursuant to Federal Rule of Criminal Procedure 47 to intervene in this matter for the limited purpose of opposing Defendant Senator Robert Menendez's request to maintain under seal the unredacted version of his Memorandum of Law In Support of His Motions to Dismiss Based on Lack of Venue and Duplicity, and His Severance Motion, *see* ECF Nos. 136, 137, 251-1 ("Severance Motion"). In support of this Motion, the Media Coalition relies on the accompanying Memorandum of Law In Support of Media Coalition's Motion to Intervene and Unseal Defendant Senator Robert Menendez's Severance Motion.

As explained therein, the Media Coalition's intervention in this matter is proper in order to vindicate the press's and the public's constitutional and common law rights of access to judicial records, and Senator Menendez's request to maintain his Severance Motion under seal is without basis in law or fact. The Media Coalition therefore respectfully requests that the Court grant its Motion to Intervene, and further that the Court deny Senator Menendez's Letter Motion Seeking Leave to Maintain Redacted Portions Under Seal, ECF No. 251, order the unredacted version of his Severance Motion to be immediately filed on the public docket, and provide any other relief the Court deems just and proper.

Dated: April 5, 2024

Respectfully submitted,

BALLARD SPAHR LLP

/s/ Joseph Slaughter

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April, 2024, I directed that a true and correct copy of the foregoing **MEDIA COALITION'S MOTION TO INTERVENE AND UNSEAL DEFENDANT SENATOR ROBERT MENENDEZ'S SEVERANCE MOTION** and accompanying memorandum of law be served via U.S. Mail and electronic mail upon the following counsel of record:

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